

# **EXHIBIT L**

**FILED UNDER SEAL**

Page 1

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

-----

IN RE: SOCIAL MEDIA )  
ADOLESCENT )  
ADDICTION/PERSONAL INJURY )  
PRODUCTS LIABILITY )  
LITIGATION, ) Case No.  
 ) 4:24-cv-1377  
This Document Relates to: )  
 )  
Jordan School District )  
v. Meta Platforms Inc., )  
et al. )

-----

VIDEOTAPED DEPOSITION OF: BRYCE LANE DUNFORD

MAY 7, 2025

9:02 A.M. TO 4:01 P.M.

Location: LAW OFFICES OF KIRKLAND & ELLIS  
95 South State Street, Suite 2000  
Salt Lake City, Utah

Reporter: Vickie Larsen, CCR/RMR  
Utah License No. 109887-7801

Nevada License No. 966

Notary Public in and for the State of Utah

1 APPEARANCES

2 For the Plaintiff Jordan School District:

3 Austin Brane  
4 WAGSTAFF & CARTMELL, LLP  
5 4740 Grand Avenue, Suite 300  
6 Kansas City, Missouri 64112  
7 816.701.1100  
8 Abrane@wcllp.com

9 For the Defendant TikTok:

10 Christopher R. Cowan  
11 Bailey Langner  
12 KING & SPALDING  
13 50 California Street, Suite 3300  
14 San Francisco, California 94111  
15 415.318.1200  
16 Ccowan@kslaw.com  
17 Blangner@kslaw.com

18 For the Defendant Meta:

19 Russell J. Shankland  
20 SHOOK, HARDY & BACON, LLP  
21 2555 Grand Boulevard  
22 Kansas City, Missouri 64108  
23 816.474.6550  
24 Rshankland@shb.com

25 Frantz J. Duncan (present by Zoom)  
SHOOK, HARDY & BACON, LLP  
2001 Market Street, Suite 3000  
Philadelphia, Pennsylvania 19103  
215.278.2555  
Fduncan@shb.com

For the Defendant Google/YouTube:

Sophia Young (present by Zoom)  
Annie E. Showalter (present by Zoom)  
WILLIAMS & CONNOLLY  
680 Maine Avenue SW  
Washington, DC 20024  
202.434.5333  
Syoung@wc.com  
Ashowalter@wc.com

Page 3

1 APPEARANCES CONTINUED

2 For the Defendant Snap:

3 Patrick G. Maroun (present by Zoom)

KIRKLAND & ELLIS

4 333 West Wolf Point Plaza

Chicago, Illinois 60654

5 312.862.2000

Patrick.maroun@kirkland.com

6 Also Present:

7 Paul Van Komen (present by Zoom)

8 Eric Largin, videographer

Lance Hoeppe, trial tech

9  
10 -oOo-

Page 4

## I N D E X

	Page
BRYCE LANE DUNFORD	
EXAMINATION BY MR. COWAN	7
EXAMINATION BY MR. BRANE	274
EXAMINATION BY MR. COWAN	295

-oOo-

## E X H I B I T S

No.	Description	Page
Exhibit 1	Photograph	29
Exhibit 2	Resume of Bryce L. Dunford	33
Exhibit 3	Plaintiff's Third Amended Answers to Defendants' Interrogatories to Board of Education of Jordan School District (Set 1)	97
Exhibit 4	Jordan School District Minutes of Board of Education Meeting dated January 23, 2024	158

1 Q. BY MR. COWAN: Okay. Other  
2 than the paper, did you -- were you involved  
3 in literally writing a response to an  
4 interrogatory that was served in this case?

5 And it would have said,  
6 Interrogatory number X. Here's the question.  
7 I'm writing down the answer.

8 Did you ever do that?

9 A. No.

10 Q. To your knowledge, did you ever  
11 provide information that would be used by  
12 someone to draft a response to an  
13 interrogatory that's been served in this  
14 case?

15 A. No.

16 Q. What about the plaintiff fact  
17 sheet? Did you provide any information on  
18 behalf of the Jordan School District that  
19 would have been included in the plaintiff  
20 fact sheet served in this case?

21 A. I did not.

22 Q. I'm going to Tab 2.

23 I'm marking this document.

24 This is Plaintiff's Third Amended Answers to  
25 Defendants' Interrogatories to Board of

Page 97

1 Education of Jordan School District (Set 1).  
2 And I'm passing that to you as Exhibit  
3 Number 3.

4 (Exhibit 3 was marked for identification.)

5 Q. BY MR. COWAN: This will be  
6 quick, sir.

7 A. Give me a second to read it.

8 Q. Sure. And to -- to -- to make  
9 your reading easier, I am going to be asking  
10 you only about Page 5.

11 A. Okay.

12 Q. Sir, first question is: Have  
13 you ever seen Exhibit 3 before -- before  
14 today?

15 A. I have not.

16 Q. Okay. If you go to, starting  
17 on Page 3 and running to Page 5, there's an  
18 interrogatory that was responded to by the  
19 board of education of Jordan School District.

20 Do you see where I'm at?

21 A. Uh-huh.

22 Q. And it's basically the  
23 interrogatory's asking, for all intents and  
24 purposes, hey, tell us who might have  
25 information that's relevant to this case,

1       okay?

2                       And then there's a response  
3       that the Jordan School District made starting  
4       on Page 4.

5                       Do you see that?

6               A.       Yes.

7               Q.       And they list out a number of  
8       people, starting in the middle of Page 4.

9                       Do you see that?

10              A.       Yes.

11              Q.       And if you skip to Page 5, at  
12       the top of it is your name, Dunford, Bruce,  
13       Jordan School District --

14              A.       Bryce.

15              Q.       -- board member. I'm so sorry.  
16       Let me say that again.

17                      At the top of Page 5 your name  
18       is listed, Dunford, Bryce, Jordan School  
19       District board member.

20                      Do you see that?

21              A.       I do.

22              Q.       And it talks about in the other  
23       column that your knowledge of relevant  
24       information would include "the impact of  
25       social media use on district operations from



1 the perspective of the board of education,  
2 including board decisions on using limited  
3 resources to address social media and board  
4 decisions to increase taxes, and provide  
5 information on patron attitudes regarding  
6 related issues."

7 Do you see that?

8 A. Yes.

9 Q. And you would agree -- or do  
10 you agree that you have that kind of  
11 information?

12 A. I agree that I could provide  
13 that information.

14 Q. All right. Underneath that is  
15 your son is listed, Logan Dunford, Bingham  
16 High School graduate.

17 Do you see that?

18 A. Yes.

19 Q. And it just -- his category of  
20 information is just about prevalence of  
21 impact of student social media use.

22 Do you see that?

23 A. Yes.

24 Q. Did you know that your son had  
25 been identified by plaintiff's counsel in a

1 discovery response?

2 A. To that extent, no. But I --

3 MR. BRANE: Hold on. Don't --  
4 instruct the witness not to reveal the  
5 contents of any attorney-client  
6 communications.

7 Q. BY MR. COWAN: I'm not asking  
8 for your attorney-client communications. I  
9 just wanted to know if you had any idea that  
10 this had happened?

11 MR. BRANE: Same instruction.

12 THE WITNESS: No.

13 Q. BY MR. COWAN: Does your son  
14 know, to your knowledge, that he's been  
15 identified as a potential witness in this  
16 case?

17 A. Yes.

18 Q. How did he come to that  
19 understanding?

20 A. I told him.

21 Q. So you had been told that he  
22 might be a witness; correct?

23 A. Yes.

24 Q. Who told you that he might be a  
25 witness?

1 A. Legal counsel.

2 Q. When?

3 MR. BRANE: Object to form.

4 THE WITNESS: Shortly after I  
5 took him to the press release that we  
6 were bellwether plaintiff in this  
7 case, and he answered questions to the  
8 media.

9 Q. BY MR. COWAN: Shortly after  
10 that?

11 A. Yes.

12 Q. When was that?

13 MR. BRANE: When was the  
14 article?

15 MR. COWAN: Yeah.

16 Q. When was the press conference  
17 that you're referring to?

18 A. Sometime in '24.

19 Q. Okay. So you told your son  
20 sometime in 2024 that he was likely to be  
21 identified as a potential witness in this  
22 case?

23 A. Yes.

24 Q. Did he have a reaction to that?

25 A. Yes.

1 Q. What was his reaction?

2 A. Hesitance but willingness.

3 Q. Did he say anything in  
4 particular that you recall?

5 A. No.

6 Q. Do you recall the month in 2024  
7 where you told your son that he was likely to  
8 be a witness in this case?

9 A. I do not.

10 Q. Do you recall if it was cold  
11 outside or warm outside during the press  
12 conference?

13 A. It wasn't snowing.

14 Q. So it probably was earlier than  
15 December?

16 A. Probably.

17 Q. If the article was published in  
18 July, does that sound right to you?

19 A. That sounds right.

20 Q. So sometime around July or the  
21 summer, late summer of 2024, you told your  
22 son that he would likely be a potential  
23 witness in this case?

24 A. Yes.

25 Q. And you did so because your

1 counsel told you that?

2 A. No.

3 MR. BRANE: Object to form.

4 Q. BY MR. COWAN: Okay. I thought  
5 you said that your counsel had told you that  
6 he was likely to be a potential witness?

7 A. Yes, but that's not why I told  
8 my son.

9 Q. Why did you tell your son?

10 A. I asked my son if he'd be  
11 willing to be a witness, and he said yes.

12 Q. You said that your counsel told  
13 you that he was likely to be a witness around  
14 the time of the press conference; correct?

15 A. Correct.

16 Q. All right. You can put that  
17 down.

18 As a board member, you would  
19 have been involved in the decision to  
20 actually file this lawsuit; correct?

21 A. Correct.

22 Q. The board hired its counsel in  
23 this case in December of 2023; correct?

24 A. I believe that's true.

25 Q. It's reflected in your minutes.